

401 Spring Lane P. O. Box 1990 Waynesboro, VA 22980-7590

# Mary McDermott Senior Vice President

Legal and Regulatory Affairs

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February 26, 2008

## VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

Ms. Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Suite TW-A325 Washington, DC 20554

RE: EB Docket No. 06-36 – CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

On behalf of NTELOS Inc., please find the attached 2007 annual CPNI Certification and accompanying Statement which is being filed pursuant to Commission Rule 64.2009(e).

If you have any questions regarding this filing, please contact me at 540-946-8677 or email mcdermottm@ntelos.com

Sincerely,

Mary McDermott

Senior Vice President - Legal and Regulatory Affairs

Attachments

Cc:

FCC Enforcement Bureau, Telecommunications Consumers Division 445 12<sup>th</sup> Street, SW, Washington, DC 20554 (2 copies via USPS Mail) Best Copy and Printing, Inc., (via email FCC@BCPIWEB.com)

#### NTELOS Inc.

## 401 Spring Lane Plaza, Waynesboro, VA 22980

### Annual 47 C.F.R. 64.2009(e) CPNI Certification

#### **EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 26, 2008

Names of Companies Covered by this Certification:

NTELOS Inc. is the holding company for the following affiliated companies: 499 Filer ID Company NTELOS Telephone Inc. 807075 NTELOS Network Inc. 807076 NTELOS of West Virginia Inc. 807074 Virginia RSA 6 LLC 807081 Roanoke and Botetourt Telephone Company 807819 R&B Network, Inc. 807820 The Beeper Company 807821 Virginia PCS Alliance L.C., dba NTELOS 816030 West Virginia PCS Alliance L.C., dba NTELOS 818784

Name of signatory: Mary McDermott

Title of signatory: Senior Vice President - Legal and Regulatory Affairs

I, <u>Mary McDermott</u>, certify that I am an officer of NTELOS Inc. and the affiliated companies named above (collectively and individually "Company") and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission"). See 47 C.F.R. 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in 2007 or related to 2007. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompany statement.

The Company has not received any customer complaints in 2007 concerning the unauthorized release of CPNI.

The Company has not had any known CPNI security breaches in 2007.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.

signed 🔏

Attachment

2007 CPNI Certification

# NTELOS Inc. 2007 ANNUAL COMPLIANCE STATEMENT OF THE FCC'S CPNI RULES February 26, 2008

This Statement accompanies the Company's 2007 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("Commission") Rules for the purpose of explaining how the operating procedures of the Company ensures compliance with Part 64, Subpart U of the Commission's Rules. See 47 C.F.R. § 64.2001 et seq.

1. NTELOS Inc. ("NTELOS") is the holding company for the following affiliated companies that provide telecommunication services:

Company	499 Filer ID
NTELOS Telephone Inc.	807075
NTELOS Network Inc.	807076
NTELOS of West Virginia Inc.	807074
Virginia RSA 6 LLC	807081
Roanoke and Botetourt Telephone Inc.	807819
R&B Network Inc.	807820
The Beeper Company	807821
Virginia PCS Alliance L.C., dba NTELOS	816030
West Virginia PCS Alliance L.C., dba NTELOS	818784

- 2. NTELOS has operating procedures to ensure compliance with the governing statute and the Commission's CPNI rules.
- 3. NTELOS only uses, discloses, or permits access to CPNI received or obtained by virtue of its provision of a telecommunications service for the purposes explicitly authorized in the governing statute and rules, including the provision of the telecommunications service from which such information is derived, and the provision of services necessary to or used in the provision of such telecommunications service.
- 4. NTELOS uses, for example, CPNI in order to initiate, render, bill and collect for telecommunications services provided. NTELOS may use CPNI in order to protect its ts or property, or to protect users and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

- 5. NTELOS does not currently use, disclose or permit access to CPNI for the purpose of marketing services outside of the categories of service to which the customer already subscribes. NTELOS does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers. NTELOS does not sell CPNI to other entities.
- 6. Since NTELOS does not use CPNI in any manner that would require customer approval under the Commission's rules, NTELOS does not currently solicit customer approval for use of CPNI. Should NTELOS intend to use CPNI in a manner that would require customer approval; NTELOS will implement systems by which the status of a customer's CPNI approval can be clearly established prior to such use of the CPNI.
- 7. NTELOS has established procedures and trains its personnel as to when they are, and are not, authorized to use CPNI.
- 8. NTELOS has an express disciplinary process in place to address any unauthorized use of CPNI.
- 9. NTELOS maintains records of our marketing campaigns for one year.
- 10. NTELOS has a supervisory review process to ensure its compliance with CPNI requirements for outbound marketing situations.
- 11. During 2007, NTELOS implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:
  - a. Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.
  - b. NTELOS provides customers with on-line access to customer account information controlled by password.
  - c. NTELOS has implemented procedures to notify customers of account changes or other attempts at access to their account information.
- 12. NTELOS has adopted procedures for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.